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Docket Management Facility
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U.S. Department of Transportation
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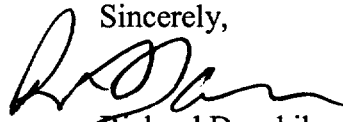
DEPT OF TRANSPORTATION
PORTS

Re: Deepwater Ports

I believe that the matters described below should be addressed in your rules on deepwater ports:

1. Comments are requested on the voluntary use of a safety and environmental management system. A similar facility operating in State waters would be subject to the regulations of the Occupational Safety and Health Administration and would need to implement a Process Safety Management system –which is similar to the API RP75 system. Such a system should be mandatory.
2. All deepwater ports should be required to establish a system for “vetting” the tankers proposing to use the facility to assure, in advance of their loading cargo destined for the port, that they meet all safety and environmental standards.
3. “Net under-keel clearance” should include explicitly include the effects of vessel squat.
4. The overall site plan should address the decommissioning and, ultimately, the removal of the facility.
5. The rule should specify the return periods to be used for the imposition of environmental loads on the facilities and should also specify when joint probabilities for these loads should be used. Low-probability/high consequence events should also be considered, such as tsunami and earthquakes. Periodic review of the assumptions should be required, particularly with respect to subsidence and sea-level change. 10,000 year return periods are being used for manned facilities by most advanced industrialized countries.
6. Deepwater ports should be required to be equipped with Automatic Identification Systems (AIS). They should transmit AIS information regarding their safety zone. They should receive and monitor AIS information on vessels approaching the facility.
7. The publicly available documents for any deepwater port application should be made available to the public using the Docket Management Facility.
8. The environmental review criteria should explicitly include air quality considerations on a regional scale, with modeling integrated with that of the adjacent coastal state and its State Implementation Plan. Tankers should be required to use low sulphur fuel from the time they enter the exclusive economic zone destined for a deepwater port until they are once again outside the zone.

9. The regulations should require that the deepwater port be able to have radio communications with the helicopters supporting the facility.
10. There should not be an exemption from the requirement to receive and process oil residues for "vessels engaged in a vessel-to-vessel transfer." The port should be able to receive and process residues from any vessel using the port.
11. If fire pumps and firefighting equipment are going to be provided, there would seem to be a need to specify the type of training that the facility personnel will receive.
12. Equipment standards should be specified for the deepwater port's cranes and other weight handling equipment.
13. The operating manual should also specify limiting weather conditions for helicopters and support vessels, and for precautionary evacuation of the port's personnel.

Sincerely,

Richard Danchik